

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION**

In the Matter of the Petition Of GRACE OCEAN PRIVATE LIMITED, as Owner of the M/V DALI, And SYNERGY MARINE PTE LTD, as Manager of the M/V DALI, for Exoneration from or Limitation of Liability	Docket No. JKB 24-cv-941 <u>IN ADMIRALTY</u>
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**CLAIMANTS' MOTION FOR
SUMMARY JUDGMENT TO DISMISS SYNERGY MARINE'S
PETITION FOR LIMITATION DUE TO ITS LACK OF STANDING**

Claimants, appearing herein through court-appointed lead counsel, respectfully move this Court pursuant to Federal Rule of Civil Procedure 56 for summary judgment dismissing Synergy Marine PTE Ltd.'s ("Synergy Marine") petition for limitation due to its lack of standing. The Limitation of Liability Act, 46 U.S.C. §§ 30501-30530, applies only to vessel "owners" or "owners pro hac vice." Synergy Marine, the "Manager" of the M/V DALI, is neither.

As set forth in greater detail in the accompanying memorandum, Grace Ocean Private Limited (“Grace Ocean”) is the DALI’s owner, and because the undisputed facts show that Grace Ocean did not “completely and exclusively relinquish ‘possession, command, and navigation’” of the vessel, Synergy Marine is not an “owner pro hac vice.” Synergy Marine therefore lacks standing to invoke the Limitation Act, and its petition for limitation should be dismissed as a matter of law.

WHEREFORE, Claimants respectfully move this Court for summary judgment dismissing Synergy Marine’s petition for limitation due to its lack of standing.

Respectfully submitted this 29th day of August 2025,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of August 2025, a copy of the foregoing pleading was served via the court's CM/ECF system on all counsel of record.

/s/ R. Keith Jarrett

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